

3-27-86

DECLARATION OF GERALD ARMSTRONG

I, GERALD ARMSTRONG, having personal knowledge of the following, state and declare the following to be true:

1. I am a former Scientologist who worked directly for L. Ron Hubbard until December 1981. At that time, I was working on an authorized biography of L. Ron Hubbard and discovered that many of the claims Hubbard made about his past and his qualifications were false.

2. Since I left the organization, I have been a target of constant harassment. I have been sued once and the organization has attempted to have me arrested on at least two occasions on trumped up charges. I was completely exonerated in the case in which I was sued, Church of Scientology v. Armstrong, No. C 420 153, Los Angeles Superior Court. In fact, after a five-week trial, Judge Breckenridge found that I "was the subject of harassment, including being followed and surveilled by individuals who admitted being employed by plaintiff (Church of Scientology); being assaulted by one of these individuals; being struck bodily by a car driven by one of these individuals; having two attempts made by said individuals

apparently to involve defendant Armstrong in a freeway automobile accident; having said individuals come into defendant Armstrong's property, spy in his windows, create disturbances, and upset his neighbors."

3. As part of their campaign of harassment, the Church of Scientology has taken my deposition in numerous cases. These include:

* <u>Burden v. Church of Scientology of California</u>	3 days
* <u>Church of Scientology and Mary Sue Hubbard v. Armstrong</u>	5 days
<u>Van Schaick v. Church of Scientology of Calif.</u>	3 days
<u>Church of Scientology v. Cooper</u>	2 days
* <u>In Re Estate of L. Ron Hubbard</u>	1 day
* <u>McLean v. Church of Scientology of Calif.</u>	2 days
<u>Christofferson v. Church of Scientology of Calif.</u>	2 days
<u>Church of Scientology of California v. Flynn</u>	1 day
<u>Wollersheim v. Church of Scientology of Calif.</u>	2 days

*The cases marked with an asterisk are cases in which Mary Sue Hubbard was a party.


4. I have also testified at length in three trials involving Scientology. I was on the stand for 10 days in Church of Scientology of California and Mary Sue Hubbard v. Armstrong;

12 days in Christofferson v. Hubbard, et al; and one day in In Re B & G Wards. Between trials and depositions, accordingly, I have testified for 44 days. One of these days was in the underlying suit which precipitated this abuse of process claim. I do not know what more could be asked about my relationship to L. Ron Hubbard, Mary Sue Hubbard or Scientology. It should also be noted that one of the defendants is my attorney, and my conversations with him are privileged.

5. Mary Sue Hubbard was a party to many of these cases I was deposed in, including Armstrong, where she intervened. The close relationship between her and Scientology cannot be ignored. For years she was the second highest official of the organization, and ultimately went to federal prison for the actions she took in the organization. See United States v. Heldt, 668 F.2d 1238 (D.C. Cir. 1981). Moreover, I believe the Church of Scientology is paying her attorneys' fees in this case. I know that Mrs. Hubbard has admitted that they paid her legal expenses in other cases in which she was a party.

6. The latest deposition Mrs. Hubbard seeks is pure harassment. She already has all the testimony she could ever desire from me. Mrs. Hubbard is not seeking legitimate discovery, but only seeking to punish me for speaking out against the tortious and criminal activities of her, her husband the her organization.

Signed and sworn under the pains and penalties of
perjury under the laws of the State of California this 27th
day of March 1986 in Boston, Massachusetts.


GERALD ARMSTRONG

March 27, 1986

Robert R. Lee, Esq.
10812A Washington Blvd.
Culver City, CA 90232

Dear Mr. Lee:

Enclosed please find a copy of a complaint filed in US District Court in Utah against Omar Garrison.

I'm sending you this because you represented Omar in the settlement negotiations out of which this complaint has apparently arisen.

I've written to Omar, who is presently in Spain but expecting to return to the US in mid-April, and informed him about the complaint and that I have forwarded you a copy. I don't think anything should be done until Omar contacts you, if he does. I just thought you should be apprised in case he does want you to do anything.

If you have any questions or need to contact me, my phone number is (617)350-7200.

Very truly yours,

Gerry Armstrong

enclosure

xc: OVG

UNITED STATES DISTRICT COURT
OFFICE OF THE CLERK
DISTRICT OF UTAH
P.O. BOX 3900
SALT LAKE CITY, UTAH 84110

PAUL L. BADGER
CLERK

March 24, 1986

Jerry Armstrong
c/o Flynn & Joyce
400 Atlantic, Avenue
Boston, Mass 02210

Re: New Era Publication -vs- Omar V. Garrison 86-C-0144W

Dear Mr. Armstrong:

Enclosed you will find the copy work you requested. The cost for copies is \$.50 per page, therefore, for 12 pages, the cost is \$ 6.00.
Other work: . Total cost \$ 6.00

As we have no billing procedure in this office, please send your remittance as soon as conveniently possible. Please place the above case number(s) on your check so as to identify it.

If we can be of any further assistance to you, please let us know.

Sincerely,

PAUL L. BADGER, CLERK

By: *Mary Anne Shanson*
Deputy Clerk

**PLEASE RETURN THIS LETTER WITH YOUR REMITTANCE. THANK YOU.

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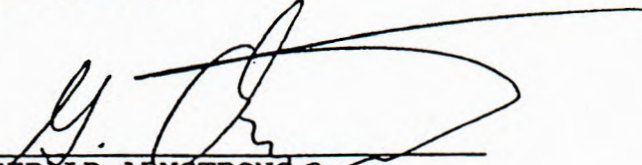
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GERALD ARMSTRONG